

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**LEAGUE OF UNITED LATIN  
AMERICAN CITIZENS - RICHMOND  
REGION COUNCIL 4614, ELIUD  
BONILLA, LUCIANA FREEMAN, and  
ABBY JO GEARHART,**

**Plaintiffs,**

**v.**

**PUBLIC INTEREST LEGAL  
FOUNDATION  
and J. CHRISTIAN ADAMS,**

**Defendants.**

**Civil Action No. 1:18-cv-00423  
(LO/IDD)**

**DEFENDANTS' OBJECTIONS TO  
PLAINTIFFS' PROPOSED DEPOSITION DESIGNATIONS**

Defendants, Public Interest Legal Foundation and J. Christian Adams, by counsel, respectfully state as follows for their objections to Plaintiffs' Proposed Deposition Designations (Dkt. #156). In addition to the following specific objections, Defendants object to Plaintiffs' proposed use of deposition designations for non-party witnesses who are within the subpoena power of the Court and available to testify at trial. The parties have agreed to reserve the right to object to counter designated testimony before the commencement of trial.

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122:9-124:25	
125:12-126:13	
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Respectfully submitted,

PUBLIC INTEREST LEGAL FOUNDATION  
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Counsel for Defendants

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 4, 2019, I filed the foregoing DEFENDANTS' OBJECTIONS TO PLAINTIFS' DEPOSITION DESIGNATIONS using the CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

/s/ Michael J. Lockerby